

IN THE UNITED STATES DISTRICT COURT

FILED

FOR THE EASTERN DISTRICT OF TEXAS

M. 11/19 2009
DAVID J. MALAND, CLERK
U.S. DISTRICT COURT

LUFKIN DIVISION

By _____

DEPUTY

UNITED STATES OF AMERICA

§

§

VS.

§

CRIMINAL NO. 9:09-CR-38

§

PATRICK SANDERS

§

INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

COUNT ONE

On or about May 4, 2009, in the Eastern District of Texas, **Patrick Sanders**, the defendant herein, did use, employ, persuade, induce, and entice a person under the age of eighteen, specifically John Doe, to engage in sexually explicit conduct, specifically, the lascivious exhibition of the genitals and the pubic area of said minor, for the purpose of producing visual depictions of such conduct. The visual depictions were produced using materials that had been mailed, shipped and transported in interstate and foreign commerce, all in violation of Title 18, United States Code, Section 2251(a).

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

Criminal Forfeiture Pursuant to 18 U.S.C. § 2253(a)

As the result of committing one or more of the foregoing offense federal violations involving the sexual exploitation of children as specified in 18 U.S.C. § 2253(a), alleged

in this Indictment, Defendant herein, shall forfeit to the United States pursuant to 18 U.S.C. § 2253(a):

1. any visual depiction described in section . . . 2252 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter;
2. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
3. any property, real or personal, used or intended to be used to commit or to promote the commission of such offense, including, but not limited to the following:

Personal Property

1. Compaq Presario, Model C700 bearing serial number CND8312C9W hard drive;
2. Polaroid i531 camera; and
3. Samsung Model SPH-M800 cellular telephone.

Substitute Assets

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant -

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with a third person;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be

subdivided without difficulty;
it is the intent of the United States, pursuant to 18 U.S.C. § 2253(o), to seek forfeiture of
any other property of Defendant up to the value of the above forfeitable property,
including but not limited to all property, both real and personal owned by Defendant.
By virtue of the commission of the offenses alleged in this Indictment, any and all interest
the Defendant has in the above-described property is vested in the United States and
hereby forfeited to the United States pursuant to 18 U.S.C. § 2253(a).

A TRUE BILL



GRAND JURY FOREPERSON

JOHN M. BALES
UNITED STATES ATTORNEY


LISA G. FLOURNOY

ASSISTANT U. S. ATTORNEY


DATE

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NOTICE OF PENALTY

COUNT ONE

Violation: 18 U.S.C. §2251(a)

Penalty: A term of imprisonment of not less than fifteen (15) years nor more than thirty (30) years. A fine not to exceed \$250,000.00 or both. A term of supervised release of not more than five (5) years. 18 U.S.C. §2251(e)

Special Assessment: \$100.00